

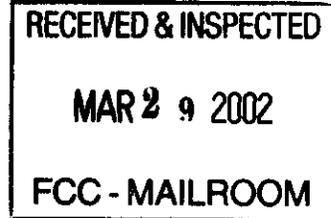
# Japan GPS Council

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January 18, 2002

○ Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554



SUBJECT: Comments on ET Docket 98-153 /

We are the Japan GPS Council which was established in 1992 as a non-profit trade association representing the interests of the civilian GPS user community in Japan. At this time our membership consists of approximately 80 firms and organizations including all major automobile manufacturers, car component manufacturers, electronics makers, GPS related products applicators, trading companies and a wider range of user groups such as surveying and telecommunications. GPS has been widely adopted by both the public and private sectors in Japan. Because the US has made great investments to ensure the reliability and uncompromising availability of GPS signals worldwide, Japan, like many other nations, now relies upon GPS for many critical and safety-of-life applications such as air traffic control, maritime safety, earthquake prediction, land traffic management, disaster relief management and thousands of other applications. Japan's leadership in GPS and markets has been accomplished not in competition with US interests, but in partnership with US industry and in cooperation with US government policy makers. For nearly a decade we have worked with our counterparts and colleagues in US industry and government to develop civilian GPS applications, ensure open commercial markets and safeguard vital national security interests. Working together, these efforts have made GPS a truly global utility and one of the great international technological success stories.

Due to this major dependency on GPS in critical public and private infrastructure applications, and the mutual benefit derived from a shared global resource, we have been watching the debates concerning potential interference with GPS low power signals from ultra wideband devices (UWB) under ET-Docket 98-153. with keen interest. Although there seems to be currently no UWB manufacturers or users in Japan, it is clear that any decision made in the US on UWB will establish at least a de facto precedent for other telecommunications and spectrum management policy bodies worldwide. Due to the potentially global impact of any FCC decision on UWB policy, it is even more important that these decisions be made in a prudent, cautious and far-sighted manner. The difficulties and conflicts that have surfaced in the current US debate can only become orders of magnitude greater when played out on international and multilateral stage. Because technology today has no borders, a less than thorough review of the issue in US decision making, only ensures more complex and difficult international ramifications.

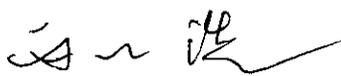
For this reason we are deeply concerned by the ongoing debates concerning the introduction of UWB into restricted spectrum bands. Clearly, introducing additional noise and potential interference into GPS bands would undercut the effectiveness of GPS in a large number of existing safety-of-life and critical infrastructure applications in the public and private sectors. Clearly, the potential for damaging

interference to GPS from UWB devices has been amply demonstrated. Clearly, the complexity and length of the current debate demonstrates that there are few, if any easy answers. Undercutting the actual or even the perceived reliability and integrity of GPS would not only be severely disruptive on a global scale, it would undermine the value of the existing US investment in GPS and damage US technological leadership in satellite navigation.

A solution, however, must be sought, which allows the introduction of new technologies while preserving the gains and guaranteeing the continued growth of other leading-edge technologies. We believe that such solutions have already been brought before the Commission by a number of parties. We are hopeful that the Commission will continue to pursue this issue in a prudent and far-sighted manner and will avoid any decision that will allow UWB devices to operate across restricted bands. Instead we hope that the Commission will continue its research and work to identify appropriate spectrum above 3.2 GHz for the safe operation and development of UWB devices and applications.

Sincerely yours,

  
Moriyuki Mizumachi,  
Chairman  
The Japan GPS Council

  
Hiroshi Nishiguchi  
Secretary General  
The Japan GPS Council

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